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William G. "Bill" Robertson  
President and CEO

August 30, 2007

David A. Neumann, Ph.D.  
Health Policy Analyst  
Maryland Health Care Commission  
4160 Patterson Avenue  
Baltimore, Maryland 21215

RECEIVED

SEP 04 2007

MARYLAND HEALTH  
CARE COMMISSION

Re: Comments on Proposed Regulations:  
COMAR 10.24.05 Research Waiver Applications: Atlantic C-Port Study of  
Nonprimary PCI

Dear Dr. Neumann:

Adventist HealthCare, a hospital system that is highly experienced in providing a high volume of Percutaneous Coronary Interventions ("PCIs") annually, operates hospitals both with and without on-site cardiac surgery services. We strongly support the above-referenced proposed regulations.

Shady Grove Adventist Hospital has participated in the C-PORT study since its Maryland inception. Since then, it has established itself as a high volume provider of primary PCI services, with quality outcomes. Washington Adventist Hospital has provided high quality cardiac surgery and related services in the Washington metropolitan region for over 45 years. Shady Grove Adventist Hospital works very closely with Washington Adventist Hospital and coordinates cardiac and other services in an efficient and safe manner that benefits patients from both a quality of care and cost-effectiveness perspective.

The following specific comments are offered to enhance this valuable initiative by identifying additional review criteria that will focus on the goals of the study while ensuring a successful outcome.

#### *.04 Review of Applications*

In addition to the factors included in the review criteria, the following key points should be addressed in the requirements section and be included as factors for the consideration of applicants by the Commission:

- If not currently operating a program, the ability of the applicant to attract and sustain support from the interventional cardiac community and their patients.
- If currently operating a program, the applicant's volume of procedures and the length of time the program has sustained that volume, as evidence of support by the cardiology community.
- If currently operating a program, the applicant's proven track record including a review of the following:
  - Mean "door to balloon" time;
  - Complication rates;
  - Ability to initiate measures to treat complications in expedited manner; and
  - Quality outcomes that meet or exceed national averages based on publicly available data.
- Patient access to a program with a proven track record, an established cardiology team, and historically high volumes with quality outcomes.

Our mission is to deliver excellent healthcare through a ministry of physical, mental and spiritual healing.

Washington Adventist Hospital • Hackettstown Regional Medical Center • Adventist Home Care Services

Shady Grove Adventist Hospital • Greater Washington Sleep Disorders Centers

Adventist Senior Living Services • Potomac Ridge Behavioral Health System

Adventist Rehabilitation Hospital of Maryland

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Page 2

As a hospital system that is familiar with the infrastructure necessary to build an effective primary and nonprimary PCI program, we support this research project. With the inclusion of the additional review factors outlined above, we believe that the study will achieve excellent outcomes, enhance access to care and retain the support of experienced interventional cardiologists.

We appreciate the Commission moving forward with regulations supporting this important research project, the results of which will be an effective source of information in formulating future public policy on cardiovascular services. Thank you for the opportunity to offer these comment on the proposed regulations.

Sincerely,

A handwritten signature in dark ink, appearing to read "William G. Robertson", with a stylized flourish at the end.

William G. Robertson  
President and CEO